

EXHIBIT 36

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)
 Plaintiffs,)
 vs.) No. 20-cv-00983-TSZ
CITY OF SEATTLE,)
 Defendant.)

ZOOM VIDEO CONFERENCE DEPOSITION UPON ORAL EXAMINATION
OF
LARISA DEYOUNG

ATTENDANCE OF ALL PARTICIPANTS VIA
ZOOM VIDEO CONFERENCE

1:01 p.m.
September 19, 2022

REPORTED BY: Lauren G. Harty, RPR, CCR #2674

1 And -- and that was back when Northwest
2 Liquor was still in the case; is that right?

3 A. Yes.

4 Q. And so do you have anything that would be
5 responsive to either of these categories since the --
6 the material that you gave to Tyler earlier?

7 A. No.

8 Q. Okay.

9 Can you provide your current address for the
10 record?

11 A. [REDACTED]

12 [REDACTED]
13 Q. And is that in the [REDACTED] neighborhood?

14 A. Yes.

15 Q. Okay.

16 And where -- where do you work presently?

17 A. Northwest Liquor & Wine.

18 Q. And how long have you worked there?

19 A. About --

20 Q. Approximately.

21 A. -- seven, seven and a half years.

22 Q. So did you work at Northwest Liquor & Wine
23 for all of calendar year 2020?

24 A. Yes.

25 Q. And Northwest Liquor & Wine was initially a

1 party to this lawsuit; is that right?

2 A. That -- yes.

3 Q. And at some point Northwest Liquor & Wine
4 chose to dismiss its claims against the City with
5 prejudice; is that correct?

6 A. That's what my boss told me, yeah.

7 Q. Okay.

8 Do you know -- do you recall when that was?

9 A. I don't. A few months ago maybe.

10 Q. And I'll -- I'll represent to you that that
11 occurred in January of 2022. Does that sound right?

12 A. It could, yeah.

13 Q. Okay.

14 A. I don't know. I -- he just told me, so I
15 don't know when he did it.

16 Q. Okay.

17 Were you involved at all in the decision
18 to -- for Northwest Liquor & Wine to dismiss claims
19 against the City?

20 A. I was not.

21 Q. Who is the owner of Northwest Liquor & Wine?

22 A. Aditya Tannu.

23 Q. Can you spell the first name and last name
24 for me?

25 A. A-D-I-T-Y-A T-A-N-N-U.

1 A. I'm pretty sure that me having to relive
2 this story over and over and over is probably part of
3 the reason. Other than that, I don't know.

4 Q. Okay.

5 A. But, again, that's an assumption, nothing I
6 was told.

7 Q. Okay.

8 And -- and you are not personally a
9 plaintiff in the lawsuit; is that right?

10 A. I am not.

11 Q. What is Signal, if you know?

12 A. Signal is an app.

13 Q. And what kind of an app is Signal?

14 A. It's a communications app.

15 Q. Okay.

16 And at some point did you sign up for
17 Signal?

18 A. Yes.

19 Q. And what kind of phone do you have?

20 A. An iPhone.

21 Q. When did you sign up for Signal?

22 A. During CHOP. During the protests maybe.
23 Sometime during that. The date is confusing.

24 Q. Do you recall whether you signed up for
25 Signal when the police and the protesters were still

1 having clashes at the barriers outside of --

2 A. I don't remember when. It was probably
3 then, but I don't know if it was -- I don't -- there
4 was a lot going on, so I don't remember exactly when I
5 downloaded the app, no.

6 Q. Why did you download Signal?

7 A. Because there was a group of neighbors and
8 one of them asked us to download it to communicate
9 with one another.

10 Q. And how did you find out that there was a
11 group of neighbors on Signal?

12 A. A person told me --

13 Q. Okay.

14 A. -- Carmen.

15 Q. Who's --

16 A. She was --

17 Q. -- Carmen?

18 A. -- a neighbor of mine in the building that I
19 lived in.

20 Q. Okay.

21 And what building did you live in at the
22 time?

23 A. 1703 Twelfth Avenue.

24 Q. And is that one of the buildings owned by
25 Mr. Wanagel?

1 A. Yes.

2 Q. Okay.

3 And what -- what was -- what is Stephanie's
4 last name, if you know?

5 A. M-O-O-R-E-S.

6 Q. Stephanie Moores?

7 A. Yeah.

8 Q. And is -- this Signal spreadsheet appears to
9 be a spreadsheet that came from Stephanie Moores'
10 phone. Are you aware of that?

11 A. I am.

12 Q. Okay.

13 Why did Stephanie Moores' Signal data get
14 provided?

15 A. I don't know.

16 Q. Did -- do you have Signal data from -- going
17 back to June of 2020?

18 A. Well, I did until about a week ago when I
19 got a new phone and then it wasn't on there, yeah. My
20 phone -- my phone broke, and so they put all -- they
21 transferred everything over to my new one, but it
22 wasn't on there, but it was up until then.

23 Q. And do you still have that old phone?

24 A. No. Apple has it.

25 Q. Okay.

1 So you had all of the Signal data from June
2 of 2020 up until a week ago; is that right?

3 A. Yeah. I don't know. Maybe it was two
4 weeks. And then I -- yeah. Very recently.

5 Q. Do you know why -- well, was there a reason
6 why the Signal data from your phone wasn't provided to
7 us in the --

8 A. I --

9 Q. -- case?

10 A. -- don't know. I gave them -- I gave them
11 my phone and they took everything at that time, as far
12 as I know.

13 Q. Were you part of the group -- did you -- did
14 you ever talk to Stephanie Moores about needing her
15 Signal data for the case?

16 A. No.

17 Q. And did your Signal data --

18 MR. CRAMER: Strike that.

19 Q. (By Mr. Cramer) Was your Signal data
20 complete up until you turned it into the Apple Store a
21 couple of weeks ago?

22 A. Complete how? Like a form being filled out?
23 I don't understand your question.

24 Q. Sure.

25 Had you deleted any of your Signal data from

1 June of 2020 when --

2 A. No.

3 Q. -- you -- you got a new phone?

4 A. No.

5 Q. And when did you get the new phone?

6 A. A week or two ago I repeat.

7 Q. Did you get the new phone in calendar month

8 September?

9 A. I don't know. I -- it's been two, three

10 weeks. I don't know. Do you want me to like go find

11 out?

12 Q. That would be great.

13 THE WITNESS: Can we look at our credit card

14 statements and find out when we got the phones back,

15 please?

16 Q. (By Mr. Cramer) And does Stephanie Moores --
17 she worked at the Hugo House; is that right?

18 A. She does not work at the Hugo House anymore.

19 Q. Okay.

20 But she did work at the Hugo House in June
21 of 2020?

22 A. Yes.

23 Q. Okay.

24 Do you know when she stopped working at the
25 Hugo House?

1 A. I don't remember.

2 Q. Have you ever seen --

3 A. It --

4 Q. -- the --

5 A. -- was August 23rd. August --

6 Q. August --

7 A. -- 23rd.

8 Q. Just so we have a clear record, August 23rd

9 is when you got a new phone?

10 A. That's correct.

11 Q. And did you -- where did you get the new

12 phone, at a -- at a -- at the Apple Store, at a --

13 A. At --

14 Q. -- cell --

15 A. -- the Apple Store.

16 Q. And so you had your old phone until Aug --

17 August 23rd?

18 A. Yes.

19 Q. Okay.

20 Have you seen -- the document that is --

21 that we've marked as Exhibit 218, the Signal

22 spreadsheet, have you seen that before?

23 A. I don't think so.

24 Q. Does it -- have you ever seen any Signal

25 data laid out in a spreadsheet like this before?

C E R T I F I C A T E

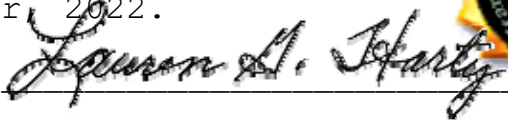
STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of LARISA DEYOUNG was taken before me on September 19, 2022, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor a relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome;

I further certify that in accordance with CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand
this 22nd day of September, 2022.


LAUREN G. HARTY, CCR #2674

